



Periodic Review

Y Pay Mor Drycleaner
2210 South 320th
Federal Way, Washington 98003

Facility Site ID#: 2518
Cleanup Site ID#: 3180

Prepared by:
Washington State Department of Ecology
Northwest Region Office
Toxics Cleanup Program

September 2018

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1.0 INTRODUCTION

This document is a periodic review by the Washington State Department of Ecology (Ecology) of post-cleanup Site conditions and monitoring data to ensure that human health and the environment are being protected at the Y Pay Mor Drycleaner (Site). Cleanup at this Site was implemented under the Model Toxics Control Act (MTCA) regulations, Chapter 173-340 Washington Administrative Code (WAC).

Cleanup activities at this Site were completed as an independent remedial action. The cleanup actions resulted in concentrations of tetrachloroethylene and cis-1,2 dichloroethane remaining in soil at the Site which exceed MTCA cleanup levels. The MTCA cleanup levels for soil are established under WAC 173-340-740. It was determined that institutional controls in the form of a restrictive covenant were required for the Site to be eligible for a no further action (NFA) determination due to the continued presence of contaminated soil. WAC 173-340-420 (2) requires that Ecology conduct a periodic review of a Site every five years under the following conditions:

- (a) Whenever the department conducts a cleanup action
- (b) Whenever the department approves a cleanup action under an order, agreed order or consent decree
- (c) Or, as resources permit, whenever the department issues a no further action opinion,
- (d) And one of the following conditions exists:
 - 1. Institutional controls or financial assurance are required as part of the cleanup;
 - 2. Where the cleanup level is based on a practical quantitation limit; or
 - 3. Where, in the department's judgment, modifications to the default equations or assumptions using Site-specific information would significantly increase the concentration of hazardous substances remaining at the Site after cleanup or the uncertainty in the ecological evaluation or the reliability of the cleanup action is such that additional review is necessary to assure long-term protection of human health and the environment.

When evaluating whether human health and the environment are being protected, the factors the department shall consider include [WAC 173-340-420(4)]:

- (a) The effectiveness of ongoing or completed cleanup actions, including the effectiveness of engineered controls and institutional controls in limiting exposure to hazardous substances remaining at the Site;
- (b) New scientific information for individual hazardous substances or mixtures present at the Site;
- (c) New applicable state and federal laws for hazardous substances present at the Site;
- (d) Current and projected Site use;
- (e) Availability and practicability of higher preference technologies; and
- (f) The availability of improved analytical techniques to evaluate compliance with cleanup levels.

The Department shall publish a notice of all periodic reviews in the Site Register and provide an opportunity for public comment.

2.0 SUMMARY OF SITE CONDITIONS

2.1 Site Description and History

The Y Pay Mor Drycleaner facility is located at 2210 South 320th Street in Federal Way, Washington. The property is in a commercial area and is surrounded by a combination of parking lots and retail businesses. The facility is located on the east end of a large commercial building that is bounded by parking lot to the north and south, and 23rd Avenue South to the east.

Site topography is generally flat with slope increasing to the east. Approximately 18 feet of vertical rise occurs east from the former dry cleaner to the surface of 23rd Avenue South. The inside area of the former dry cleaner is capped with a concrete slab which averages seven inches in thickness. A vicinity map is available as Appendix 6.1 and a Site plan is available as Appendix 6.2.

2.2 Release and Site Investigations

2.2.1 Release Information

Ecology documented releases of tetrachloroethylene (PCE) at the subject Site on October 4, 1991 and August 8, 1991. The total volume of documented release on October 4, 1991 was estimated to be 6 gallons of PCE. The volume of a second release on October 4, 1991 of 99.9% PCE "waste product" was not reported. Estimates for total volume of PCE released in the two spills are approximately 11 gallons.

2.2.2 Site Investigation Activity

AGRA conducted initial emergency response subsurface assessment at the subject Site in 1992. The assessment included a soil vapor survey, and soil boring advancement, soil sample collection and soil sample analysis. Residual phase and vapor phase contamination consisting mainly of trichloroethylene (TCE), acetone and PCE were detected in Site soils. Impacted soils appeared to occur in vadose zone (fill) soils, which extend 6.5 to 7.5 feet below the surface, in the west central portion of the former dry cleaner.

2.3 Cleanup Actions

AGRA selected vapor extraction as the remedial alternative. Ecology concurred with AGRA's remedial alternative selection incorporating vapor extraction as the remedial alternative of choice for the subject Site.

The vapor extraction system was installed in 1993. The volatile organic compounds were removed from several soil-vapor extraction wells using a vacuum blower. The air stream was treated by passing it through a steel moisture knockout tank to remove water, and possible liquid phase compounds. The air stream then passed through two activated carbon units.

The system is also designed to allow for air injection into the subsurface through air sparging well VP-7.

In June 1993, after all equipment was placed and installation activities completed, the vapor extraction system was started. Each piping network for air extraction was equipped with vacuum pressure gauges and valves to balance the system flow.

The system operated until influent concentrations indicated that soil vapors no longer contained TCE, PCE or cis-1,2 dichloroethene (cis-1,2 DCE). Groundwater monitoring was continued until 1997 to demonstrate that residual soil contamination was not impacting groundwater. Confirmational soil samples indicated the presence of TCE and cis-1,2 DCE in soil in two borings beneath the building. Groundwater confirmation samples indicated that groundwater was not impacted with contaminants at concentrations exceeding MTCA Method A cleanup levels. Tables containing soil and groundwater data for the Site area available as Appendix 6.3 and 6.4, respectively.

2.4 Cleanup Levels and Points of Compliance

WAC 173-340-704 states MTCA Method A may be used to establish cleanup levels at sites that have few hazardous substances, are undergoing a routine cleanup action, and where numerical standards are available for all indicator hazardous substances in the media for which the Method A cleanup level is being used.

MTCA Method A cleanup levels for unrestricted land use were determined to be appropriate for contaminants at this Site. The cleanup actions conducted at the Site were determined to be 'routine', few hazardous substances were found at the Site, and numerical standards were available in the MTCA Method A table for each hazardous substance. The current MTCA Method A cleanup levels for PCE, TCE and Cis-1,2 are 0.05 mg/kg, 0.03 mg/kg and 160 mg/kg, respectively.

For soil, the point of compliance is the area where the soil cleanup levels shall be attained. For soil cleanup levels based on the protection of groundwater, as they are for this Site, the point of compliance is established as soils throughout the Site.

Because the highest beneficial use of groundwater from the Site is as a potential future source of drinking water, the standard point of compliance for groundwater is appropriate for this Site. The standard point of compliance is established throughout the Site from the uppermost level of the saturated zone extending vertically to the lowest most depth which could potentially be affected by the Site.

2.5 Institutional Controls

Based on the Site use, surface cover and cleanup levels, it was determined that the Site was eligible for a 'No Further Action' determination if a restrictive covenant was recorded for the property. Initially, a restrictive covenant was recorded in 1995 that required biannual

groundwater monitoring from Site monitoring wells for 3 years. This groundwater monitoring was concluded in 1997, and a second restrictive covenant was recorded that documented residual soil contamination but did not restrict groundwater use. The specific restrictions in the final covenant are available below:

1. A portion of the property contains soil contaminated with cis-1,2-dichloroethene and tetrachloroethylene, located under the building foundation at confirmation borings CB-4 and CB-5 as shown on Exhibit A. The owner shall not alter, modify, or remove the existing structure(s) in any manner that may result in the release or exposure to the environment of that contaminated soil or create a new exposure pathway without prior written approval from Ecology.
2. Any activity on the property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.
3. Any activity on the property that may result in the release or exposure to the environment of a hazardous substance that remains on the property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.
4. The owner of the property must give thirty (30) day advance written notice to Ecology of the owner's intent to convey any interest in the property. No conveyance of title, easement, lease, or other interest in the property shall be consummated by the owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.
5. The owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the property.
6. The owner must notify and obtain approval from Ecology prior to any use of the property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.
7. The owner shall allow authorized representatives of Ecology the right to enter the property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect Remedial Actions conducted at the property, and to inspect records that are related to the Remedial Action.
8. The owner of the property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

The Restrictive Covenant is available as Appendix 6.5.

3.0 PERIODIC REVIEW

3.1 Effectiveness of completed cleanup actions

During the Site visit conducted on April 16, 2018, there were no indications that the integrity of the remedial action has been compromised. There was no evidence of undocumented Site excavation or disturbance activities, and no visual indications of disturbance of the Site surface. The Site continues to be occupied by commercial businesses. The former drycleaner location is occupied by a restaurant. A photo log is available as Appendix 6.5.

3.1.1 Direct Contact

Exposure pathways to contaminated soils (ingestion, direct contact) continue to be eliminated by the presence of protective Site surfaces including building foundations, asphalt and concrete. Remaining contaminated soil is contained beneath permanent, impermeable surfaces.

3.1.2 Protection of Groundwater

Soils with PCE and cis-1,2 DCE at concentrations exceeding MTCA Method A cleanup levels remain at the Site. Groundwater monitoring was completed in 1997. Monitoring results did not detect contamination at concentrations exceeding MTCA Method A cleanup levels.

The majority of solvent source material at the Site was removed with the vapor extraction system. Based on the age of potential release, the lack of significant remaining source material, and the shallow depth to groundwater; the groundwater data collected in 1997 represents an adequate empirical demonstration that groundwater is not likely to be impacted by concentrations of PCE or cis-1,2 DCE in soil at the Site.

3.1.3 Vapor Intrusion

A soil vapor extraction system operated beneath the building until contamination was no longer detected in the vapor stream. This indicates that residual concentrations of PCE and cis-1,2 DCE are not likely present in soil gas at concentrations that pose a threat to indoor air quality. In addition, monitoring has determined that contamination is not present in shallow groundwater at the Site. This further indicates that residual concentrations of PCE and cis-1,2 DCE are not present in the vadose zone at concentrations likely to impact indoor air quality.

3.1.4 Institutional Controls

Institutional controls in the form of a restrictive covenant were implemented at the Site in 1995 and then amended in 1998. The covenant remains active and discoverable through the King County Auditor's Office. There is no evidence a new instrument has been recorded which limits the effectiveness or applicability of the covenant. This covenant prohibits activities that will result in the release of contaminants contained as part of the cleanup without Ecology's approval, and prohibits any use of the property that is inconsistent with the covenant. This covenant serves to assure the long term integrity of the surface cover and the remedial action.

3.2 New scientific information for individual hazardous substances or mixtures present at the Site

There is no new scientific information for the contaminants related to the Site.

3.3 New applicable state and federal laws for hazardous substances present at the Site

There are no new state or federal laws applicable to hazardous substances present at the Site.

3.4 Current and projected Site use

The Site is currently used for commercial purposes. There have been no changes in current or projected future Site or resource uses.

3.5 Availability and practicability of higher preference technologies

The remedy implemented included containment of hazardous substances, and it continues to be protective of human health and the environment. While higher preference cleanup technologies may be available, they are still not practicable at this Site.

3.6 Availability of improved analytical techniques to evaluate compliance with cleanup levels

The analytical methods used at the time of the remedial action were capable of detection below selected Site cleanup levels. The presence of improved analytical techniques would not affect decisions or recommendations made for the Site.

4.0 CONCLUSIONS

The following conclusions have been made as a result of this periodic review:

- The cleanup actions completed at the Site appear to be protective of human health and the environment.
- Soil cleanup levels have not been met at the Site; however, the cleanup action for the Site is determined to comply with cleanup standards under WAC 173-340-740(6) (f), since the long-term integrity of the containment system is ensured and the requirements for containment technologies have been met.
- The restrictive covenant for the property is in place and continues to be effective in protecting public health and the environment from exposure to hazardous substances and protecting the integrity of the cleanup action.

Based on this periodic review, the Department of Ecology has determined that the requirements of the restrictive covenant continue to be met. No additional cleanup actions are required by the property owner at this time. It is the property owner's responsibility to continue to inspect the Site to assure that the integrity of the remedy is maintained.

4.1 Next Review

The next review for the Site will be scheduled five years from the date of this periodic review. In the event that additional cleanup actions or institutional controls are required, the next periodic review will be scheduled five years from the completion of those activities.

5.0 REFERENCES

AGRA Earth and Environmental. *Independent Remedial Action Report*. December 22, 1994.

AGRA Earth and Environmental. *Biannual Sampling of Monitoring Well MW-3*.
August 20, 1997.

SeaTac Plaza Corporation. *Restrictive Covenant*. August 10, 1998.

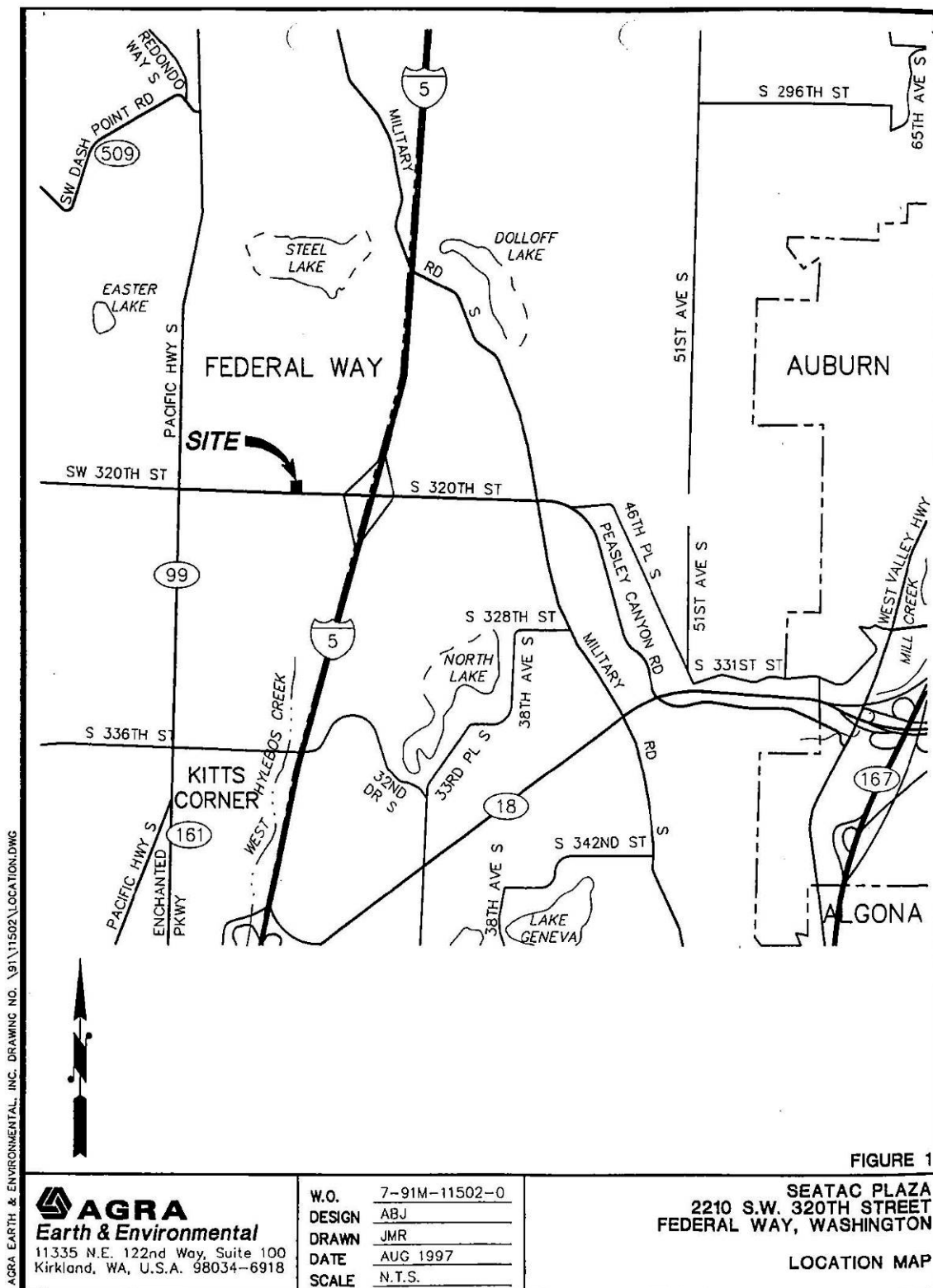
Ecology. *No Further Action Determination Letter*. October 22, 1998.

John L. Scott Real Estate. *Notice of Intent to Sell Property*. July 7, 2014.

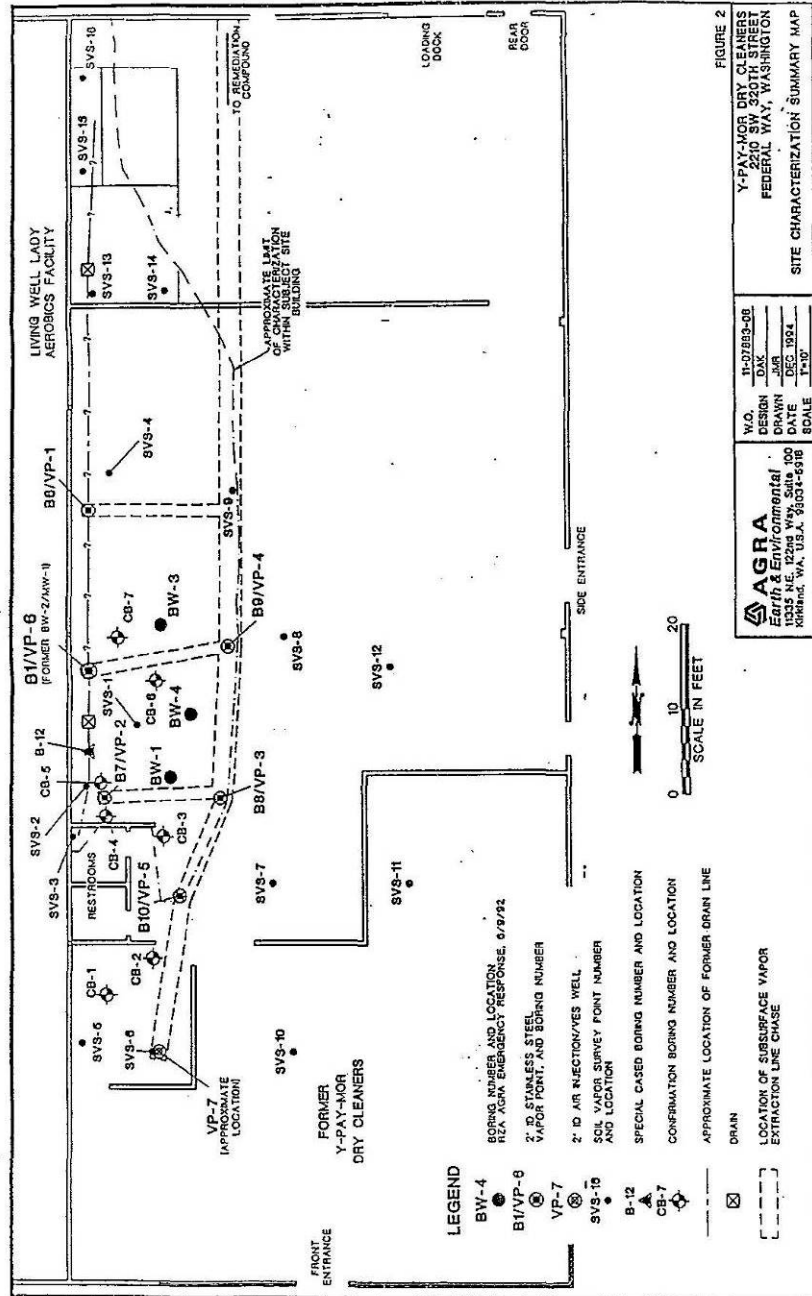
Ecology. *Site Visit*. April 16, 2018.

6.0 APPENDICES

6.1 Vicinity Map



6.2 Site Plan



6.3 Soil Concentration Table

Table 5: Summary of Confirmational Boring/Soil Analyses
Y-Pay-Mor Dry Cleaners
Federal Way, Washington
AGRA Earth & Environmental, Inc Project No. 11-07883-11

Sample I.D.	Date Collected	Depth Collected (ft)	OVM Reading (ppm)	cis-1,2-DCE (ppm)	PCE (ppm)	Methylene Chloride (ppm)
B-1/S-1	16-Nov-94	6.5 - 8.0	0.0	<0.1	<0.1	<0.1
B-2/S-1	16-Nov-94	5.0 - 6.5	0.0	<0.1	<0.1	<0.1
B-3/S-1	16-Nov-94	5.0 - 6.5	0.0	0.11	<0.1	<0.1
B-4/S-1	16-Nov-94	5.0 - 6.5	0.0	0.33	1.3	<0.1
B-5/S-1	16-Nov-94	6.5 - 8.0	0.0	71	<0.1	<0.1
B-6/S-1	16-Nov-94	5.0 - 6.5	0.0	<0.1	<0.1	<0.1
B-7/S-1	16-Nov-94	5.0 - 6.5	0.0	0.8	<0.1	<0.1
MTCA Method "A" Cleanup Level				NA	0.5	0.5
MTCA Method "B" Cleanup Level				800 8	NA	NA

Notes:

cis-1,2-DCE = cis-1,2-Dichloroethene

PCE = Tetrachloroethene

MTCA = Model Toxics Control Act

OVM used contained an 11.8 eV ionization potential lamp. OVM vapor reading was taken from soil vapor effluent immediately after withdrawing soil vapor sample.

All analytes are covered under EPA Method 8010 for volatile organics. This Method covers a broad scan of analytes.

Indicated above are the only analytes in the broad scan that were measured above the laboratory detection limit.

Analytes not shown, but covered under Method 8010 were below the laboratory detection limit for all samples.

All concentrations are expressed in parts per million (ppm).

6.4 Groundwater Concentration Table

**Table 1: Summary of Analytical Test Results: Groundwater (MW-3)
SeaTac Plaza (Former Y-Pay-Mor Dry Cleaners)
2210 SW 320th Street
Federal Way, Washington
AGRA Earth & Environmental, Inc. Project No. 7-91M-11502-0**

Sample ID	Date Collected	Depth to Water * (feet)	cis-DCE (ppb)	TCE (ppb)	PCE (ppb)
MW-3	28-Oct-92	8.56	7	TI	TI
	13-Nov-92	8.15	6.6	2.3	ND
	13-Jun-94	8.12	5.4	ND	ND
	17-Nov-94	8.63	2.2	ND	ND
	10-Feb-97	NR	1.82	ND	ND
	23-Jul-97	8.20	3.63	ND	ND
MTCA Method "A" Cleanup Level			NA	5	5
MTCA Method "B" Cleanup Level			80	NA	NA

Notes:

cis-DCE = cis-1,2-Dichloroethene

TCE = Trichloroethene

PCE = Tetrachloroethene

MTCA = Washington State, Model Toxics Control Act.

NR = Depth to water was not recorded on this date.

ND = Compound was analyzed, but was below laboratory detection limits.

TI = Compound identified, is estimated below laboratory detection limit.

* = Measured from the top of monitoring well casing.

(J) = Estimated value.

All analytes are cover under EPA Method 8240 (Dec. 1992 through Nov. 1994) and EPA Method 8260A (Feb. 1997 through July 1997) for volatile organics. These methods cover a broad scan of analytes. Compound above are the only analytes in the broad scan that were measured above the laboratory detection limits. Analytes not shown, but covered under Methods 8240 and 8260A were below the laboratory detection limits for all samples.

6.5 Environmental Covenant

COPY

9808101434 03:26:00 PM KING COUNTY RECORDS 504 THIS 11:00

Short Cressman & Burgess P.L.L.C.
Attn: Scott M. Missall
3000 First Interstate Center
999 Third Avenue
Seattle, WA 98104-4008

Document Title	Declaration of Restrictive Covenant
Reference Number(s) of Related Documents	N/A
Grantor	SeaTac Plaza Corporation
Grantee	Evergreen Plaza, a Planned Unit Development
Legal Description	Space A-6, 2210 S. 320th Street, Federal Way, Washington, located within Lot 2, KCSP No. 1079107, Recording No. 7912260667, being a portion of Tract A, Evergreen Plaza, a Planned Unit Development, Plats Vol. 100, pages 74 and 75
Parcel Number(s)	242320-0050-00

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RESTRICTIVE COVENANT

SEATAC PLAZA CORPORATION

2210 S. 320th Street, Space A-6; Former Y-Pay -Mor Dry Cleaners

This Declaration of Restrictive Covenant is made pursuant to RCW 70.105D.030(1)(f) and (g) and WAC 173-340-440 by SEATAC PLAZA CORPORATION, its successors and assigns.

An independent remedial action (hereafter "Remedial Action") occurred at the property that is the subject of this Restrictive Covenant. The Remedial Action conducted at the property is described in the following documents:

RESTRICTIVE COVENANT - 1
161509.1/3gmd/013033.00001

Preliminary Remedial Investigation, by AGRA Earth and Environmental (formerly RZA AGRA), dated November 1992.

Remediation System Installation, by AGRA Earth and Environmental (formerly RZA AGRA), dated October 1993.

Soil Vapor Extraction Remediation System, Performance Monitoring Record, by AGRA Earth and Environmental (formerly RZA AGRA), dated February 7, 1994.

Independent Remedial Action Report, by AGRA Earth and Environmental (formerly RZA AGRA), dated December 22, 1994.

These documents are on file at the Northwest Regional Office of the State of Washington Department of Ecology (hereafter "Ecology").

This restrictive Covenant is required because the Remedial Action resulted in residual concentrations of two contaminants which exceed the Model Toxics Control Act (MTCA) cleanup levels in the soil in two specific locations located under the building foundation.

The undersigned, SEATAC PLAZA CORPORATION, is the fee owner of real property (hereafter "Property") in the County of King, State of Washington, that is subject of this Restrictive Covenant. The Property is legally described as follows:

That property commonly known as Space A-6, 2210 S. 320th Street, Federal Way, Washington, located within Lot 2 as delineated on King County short Plat No. 1079107, recorded under King County Recording No. 7912260667, being a portion of Tract A, Evergreen Plaza, a Planned Unit Development, according to the plat thereof recorded in Volume 100 of Plats, pages 74 and 75, in King County, Washington.

SEATAC PLAZA CORPORATION makes the following declaration as to limitations, restrictions, and uses to which the Property may be put and specifies that such declarations shall constitute covenants to run with the land, as provided by law and shall be binding on all parties and all persons claiming under them, including all current and future owners of any portion of or interest in the Property (hereafter "Owner").

RESTRICTIVE COVENANT - 2
161509.1/3gmd/013033.00001

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Section 1. A portion of the Property contains soil contaminated with cis-1,2-dichloroethene and tetrachloroethane, located under the building foundation at confirmation borings CB-4 and CB-5 as shown on Exhibit A. The Owner shall not alter, modify, or remove the existing structure(s) in any manner that may result in the release or exposure to the environment of that contaminated soil or create a new exposure pathway without prior written approval from Ecology.

Section 2. Any activity on the Property that may interfere with the integrity of the Remedial Action and continued protection of human health and the environment is prohibited.

Section 3. Any activity on the Property that may result in the release or exposure to the environment of a hazardous substance that remains on the Property as part of the Remedial Action, or create a new exposure pathway, is prohibited without prior written approval from Ecology.

Section 4. The Owner of the Property must give thirty (30) day advance written notice to Ecology of the Owner's intent to convey any interest in the Property. No conveyance of title, easement, lease, or other interest in the Property shall be consummated by the Owner without adequate and complete provision for continued monitoring, operation, and maintenance of the Remedial Action.

Section 5. The Owner must restrict leases to uses and activities consistent with the Restrictive Covenant and notify all lessees of the restrictions on the use of the Property.

Section 6. The Owner must notify and obtain approval from Ecology prior to any use of the Property that is inconsistent with the terms of this Restrictive Covenant. Ecology may approve any inconsistent use only after public notice and comment.

Section 7. The Owner shall allow authorized representatives of Ecology the right to enter the Property at reasonable times for the purpose of evaluating the Remedial Action; to take samples, to inspect Remedial Actions conducted at the Property, and to inspect records that are related to the Remedial Action.

Section 8. The Owner of the Property reserves the right under WAC 173-340-440 to record an instrument that provides that this Restrictive Covenant shall no longer limit use of the Property or be of any further force or effect. However, such an instrument may be recorded only if Ecology, after public notice and opportunity for comment, concurs.

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DATED this 24th day of July, 1998.

SEATAC PLAZA CORPORATION

By *Richard J. Gamba*

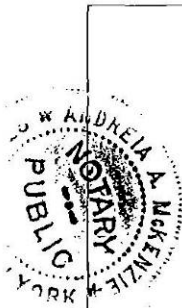
Its Vice President

STATE OF New York)
) ss:
COUNTY OF New York)

I certify that I know or have satisfactory evidence that Richard J. Gamba is the person who appeared before me, and said person acknowledged that he signed this instrument, on oath stated that he was authorized to execute this instrument and acknowledged it as the Vice President of SeaTac Plaza Corporation, a corporation, to be the free and voluntary act of such party for the uses and purposes mentioned in this instrument.

DATED: July 24th, 1998.

9808101434



ANDREA A. MCKENZIE
Notary Public, State of New York
No. 01MC6043756
Qualified in New York County
Commission Expires May 15, 1999

(Use this space for notarial stamp/seal)

Andrea A. McKenzie
Print Name: ANDREA A. MCKENZIE
NOTARY PUBLIC in and for the State of
NEW YORK, residing at 446 Central Ave. W.
My Appointment expires: 5-15-99

RESTRICTIVE COVENANT - 4
161509.1/3gmd/013033.00001

6.6 Photo log

Photo 1: Former Drycleaner - from the southeast



Photo 2: East Side of Site – from the south



Photo 3: Monitoring Well on East Side of Building – from the north



Photo 4: Monitoring Well on South Side of Building– from the east

